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UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE VALEANT PHARMACEUTICALS INTERNATIONAL, INC. SECURITIES LITIGATION

This Document Applies To:

All Actions.

No. 3:15-CV-07658-MAS-LHG

ORAL ARGUMENT REQUESTED

Motion Day: December 19, 2016

DEFENDANT PRICEWATERHOUSECOOPERS LLP'S NOTICE OF MOTION TO DISMISS THE CONSOLIDATED COMPLAINT

PLEASE TAKE NOTICE that the undersigned, counsel for Defendant PricewaterhouseCoopers LLP ("PwC"), in accordance with Federal Rules of Civil Procedure 12(b)(6) and 8(a), will move for dismissal with prejudice of Count VII of the Consolidated Complaint [ECF 80] as to PwC before the Honorable Michael A. Shipp on December 19, 2016 at 10:00 a.m., or as soon thereafter as the Court may schedule, for the reasons set forth in the accompanying Memorandum of Law and Declaration of James J. Capra, Jr. Pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), PwC respectfully requests that the Court grant oral argument on this Motion.

Dated: September 13, 2016

Respectfully submitted,

CHIESA SHAHINIAN & GIANTOMASI PC

By: /s/ A. Ross Pearlson

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